

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,

Debtors.

PROMESA

Title III

No. 17 BK 3283 – LTS

Re: ECF Nos. 210 1016

(Jointly Administered)

MOTION FOR EXTENSION OF TIME

To the Honorable Court:

COMES BEFORE THE COURT DATA ACCESS COMMUNICATION INC, NETWAVE EQUIPMENT CORP., and NUSTREAM COMMUNICATIONS CORP. (collectively referred to as the “Utility Providers”), utility providers pursuant to the *Order (A) Prohibiting Utilities from Altering, Refusing, or Discontinuing Service, (B) Deeming Utilities Adequately Assured of Future Performance, and (C) Establishing Procedures for Determining Adequate Assurance of Payment* [ECF No. 1016] (the “Utilities Order”) through the undersigned counsel, and respectfully submits this urgent motion for entry of an order granting an extension of time to file an Additional Assurance Request in light of the *Notice of Filing of Amended Schedule of Covered Governmental Agencies and Instrumentalities in Connection with the Utilities Order*. [ECF No. 2829].

NOTICE OF FILING OF AMENDED SCHEDULE

1. On May 22, 2017, the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) filed motion petitioning the Court to enter an order prohibiting the Utility providers

from altering, refusing or discontinuing services to Debtor, providing assurance for future performance, and establishing the procedures for determining adequate assurance of payment.

2. To that effect, the Honorable Court entered the corresponding Order granting said motion on August 11, 2017 [ECF No. 1016].

3. Said Order extended to all the government agencies and instrumentalities listed on Schedule 2 of the Utilities Motion, which was attached thereto.

4. On March 29, 2018, AAFAF filed motion which, for all intents and purpose, amended Schedule 2 of the Utilities Motion and Order. On the same date, AAFAF gave notice of an April 19, 2018 deadline for Additional Assurance Request with respect to any newly-identified governmental agency or instrumentality listed on the recently Amended Schedule 2.

5. Last Wednesday, April 18, 2018, a massive island-wide power outage occurred.

6. By Thursday April 19, 2018 power was partially restored throughout the island. Nevertheless, power outages remained frequent throughout the day, which resulted in frequent power surges.

7. Much of the computer equipment at the office of the undersigned was damaged by the frequent power outages and surges of Thursday, thus being unable to file this motion until today, April 20, 2018.

8. The Utility Providers provide Telecommunication services to many government instrumentalities, like the House of Representatives, which was recently made part of the Amended Schedule 2.

9. Considering the above, we respectfully request that this Honorable Court grants us until April 27, 2018, or seven calendar days to file the Additional Assurance Request, if necessary. This

will allow us to work with the Utility Providers and prepare the documentation required for a proper Additional Assurance Request while providing their service and handling of their workload.

WHEREFORE, the undersigned respectfully requests the Honorable Court takes notice of the and grants the extension of time to file the Additional Assurance Request on or before April 27, 2018.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th of April of 2018.

I HEREBY CERTIFY that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify all parties in interest.

/S/ HECTOR FIGUEROA VINCENTY
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